

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DONNA KASSMAN, SPARKLE PATTERSON,
JEANETTE POTTER, ASHWINI VASUDEVA,
TINA BUTLER, CHERYL CHARITY,
HEATHER INMAN, NANCY JONES AND
CAROL MURRAY individually and on behalf of
a class of similarly situated female employees,

Plaintiffs,

v.

KPMG LLP,

Defendant.

Civ. No. 11-CV-3743 (LGS)

CORRECTED MOTION FOR APPROVAL OF THE SETTLEMENT AGREEMENT

Plaintiffs respectfully move this Court for review and approval of a settlement agreement that seeks to resolve all pending claims before the Court. If the Court approves the Settlement Agreement and the conditions therein are met, the Parties will file a binding stipulation pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii) to dismiss with prejudice the claims of all Plaintiffs who sign the agreement. Defendant KPMG consents to this motion and will be filing a response in support of Plaintiffs' Motion for Approval of the Settlement Agreement. A copy of the Settlement Agreement and the reasons and authorities in support of this motion are more fully described in the accompanying Memorandum in Support.

Dated: April 6, 2021

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